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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

VICTOR RAMIREZ, an individual,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 2:24-cv-02290-GMN-BNW

**Stipulation and Order to Extend
Discovery Deadlines**

(First Request)

Pursuant to LR IA 6-1 and LR 26-3, the parties request a ninety (90) days extension of discovery deadlines, which is supported by grounds and circumstances set forth below. This stipulation is filed at least 21 days before the earliest deadline to be extended (amend pleadings and adding parties and initial expert disclosures). The parties have conducted discovery diligently and in good faith. However, unforeseen circumstances that are out of the parties' control necessitate the request for this extension. This is the first request for an extension of the discovery deadlines.

DISCOVERY COMPLETED

The parties have completed the following discovery:

1. Plaintiff made his initial disclosures on February 24, 2025.
2. Plaintiff served his first supplement to initial disclosures of witnesses and documents on March 17, 2025.

1 3. Plaintiff served his second supplement to initial disclosures of witnesses and
2 documents on March 25, 2025.

3 4. Defendant made its initial disclosures on March 28, 2025.

4 5. Defendant served its first set of requests for production and first set of
5 interrogatories on Plaintiff on March 28, 2025.

6 6. Plaintiff served his third supplement to initial disclosures of witnesses and
7 documents on April 14, 2025.

8 7. Plaintiff served his fourth supplement to initial disclosures of witnesses and
9 documents on April 28, 2025.

10 8. Plaintiff served his responses to Defendant's first set of requests for
11 production and first set of interrogatories on April 28, 2025.

12 9. Plaintiff served his fifth supplement to initial disclosures of witnesses and
13 documents on April 30, 2025.

14 10. Defendant served its second set of requests for production on Plaintiff on May
15 15, 2025.

16 11. Defendant served its first supplement to initial disclosures of witnesses and
17 documents on May 19, 2025.

18 12. Plaintiff served his sixth supplement to initial disclosures of witnesses and
19 documents on May 30, 2025.

20 13. Plaintiff served his responses to Defendant's second set of requests for
21 production on June 10, 2025.

22 14. Plaintiff served his seventh supplement to initial disclosures of witnesses and
23 documents on June 10, 2025.

24 15. Defendant served its second supplement to initial disclosures of witnesses and
25 documents on June 11, 2025.

26 16. Plaintiff served his first set of requests for production, first set of
27 interrogatories and first set of requests for admission on Defendant on June 13, 2025.

28 17. Plaintiff served his eighth supplement to initial disclosures of witnesses and

1 documents on June 24, 2025.

2 18. Plaintiff served his ninth supplement to initial disclosures of witnesses and
3 documents on July 10, 2025.

4 19. Defendant served its third supplement to initial disclosures of witnesses and
5 documents on July 14, 2025.

6 20. Defendant served its responses to Plaintiff's first set of requests for admission
7 on July 14, 2025.

8 21. Plaintiff provided HIPAA authorizations to allow Defendant to obtain
9 Plaintiff's pertinent medical records. Defendant is in the process of obtaining Plaintiff's
10 medical records.

11 22. Defendant took Plaintiff's deposition on May 2, 2025.

12 23. Defendant took the deposition of non-party witness Juan Chavez on May 19,
13 2025.

14 24. Defendant took the deposition of non-party witness Michael Stasiewicz on
15 June 12, 2025.

16 25. Defendant took the deposition of Sergeant William Dixon on June 16, 2025.

17 26. Plaintiff took the deposition of EMT Leon Montgomery on July 10, 2025.

18 27. Plaintiff took the deposition of Plaintiff's orthopedic surgeon, Dr. Shain
19 Howard on July 17, 2025.

20 28. Defendant scheduled the deposition of non-party witness Richard Burnett on
21 July 25, 2025.

22 29. Defendant scheduled the deposition of non-party witness Jason Masterman
23 on July 28, 2025.

24 30. Defendant scheduled the deposition of non-party witness Robert Inglett on
25 August 13, 2025.

26 31. Defendant scheduled the deposition of Plaintiff's expert, Dr. Jamie Cichon on
27 August 25, 2025.

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DISCOVERY REMAINING

Defendant is currently working on obtaining Plaintiff's medical records and is waiting to receive responses to its subpoenas from the following medical providers: Guardian Air Transport, Simon Med Imaging, Spring Valley Hospital Medical Center, Sunrise Hospital Medical Center and VA of Southern Nevada. In his most recent supplement, Plaintiff identified additional medical providers, and Defendant will be issuing subpoenas to obtain records from them as well.

The parties will need to conduct the depositions of Plaintiff's medical providers, and non-party witnesses and expert witnesses.

Plaintiff needs to schedule and conduct a Rule 35 inspection of the roadway where the accident happened to obtain core samples of the roadway and pothole, which requires coordination with the National Park Service to close that part of the road for the duration of the inspection.

The parties reserve the right to engage in any other discovery permitted by applicable rules and within the revised discovery deadlines if the court approves this stipulation.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

Since the entry of the Scheduling Order (ECF No. 12), the parties have been working diligently to advance discovery. However, there will be approximately eight (8) depositions that will have to be conducted of National Park Service personnel which will require coordination.

The extension will allow the parties to complete the depositions of the numerous witnesses involved in this case. It will also provide the time needed for Defendant to complete its requests for and obtain Plaintiff's medical records and for Plaintiff to conduct a roadway inspection. Additionally, this extension will allow the parties to address any other discovery issues that may arise.

The parties' counsel conferred and agreed that a ninety (90) days extension would be proper. The parties agree that neither party will be prejudiced by the proposed extension,

and that they may be prejudiced should the current schedule remain in place. The parties agree the extension is sought in good faith.

EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER

The following table sets forth the current deadlines and the proposed ninety (90) days extension of discovery deadlines that are the subject of this stipulated request:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Amend Pleadings/Add Parties	August 13, 2025	November 11, 2025
Initial Expert Disclosure	August 13, 2025	November 11, 2025
Rebuttal Expert Disclosure	September 12, 2025	December 11, 2025
Discovery Cutoff	November 11, 2025	February 9, 2026
Dispositive Motions	December 11, 2025	March 11, 2026
Proposed Joint Pretrial Order	January 12, 2026	April 13, 2026 ¹

This request for an extension of time is not sought for any improper purpose including delay. This is the first request for an extension of discovery deadlines in this matter.

Respectfully submitted this 21st day of July 2025.

BREEDEN & ASSOCIATES, PLLC

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: July 23, 2025

¹ However, if dispositive motions were to be filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.